



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

June 25, 1998

Bruce Gates, Treasurer
Committee for the Preservation of
Capitalism PAC
P.O. Box 22614
Alexandria, VA 22304

Identification Number: C00328468

Reference: April Quarterly (1/1/98-3/31/98) and Year End (7/1/97-12/31/97)
Reports

Dear Mr. Gates:

This letter is to inform you that as of June 24, 1998, the Commission has not received your response to our requests for additional information dated June 3, 1998. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Alicia K. Richardson on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson", is written over the typed name.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

JUN -3 1998

Bruce Gates, Treasurer
Committee for the Preservation of
Capitalism PAC
P.O. Box 22614
Alexandria, VA 22304

Identification Number: C00328468

Reference: April Quarterly Report (1/1/98-3/31/98)

Dear Mr. Gates:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

COMMITTEE FOR THE PRESERVATION OF CAPITALISM PAC
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Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

-You must attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may establish "best efforts" by providing the Commission with a description of its procedures for requesting the information. It is also in the best interests of the committee to provide a copy of its solicitation. In order to establish "best efforts", the committee must demonstrate that it makes at least one request for the information after the contribution is received. This one request must be made for any solicited or unsolicited contribution that, in the aggregate, exceeds the \$200 threshold and lacks the necessary information.

Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that, in the aggregate, exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make a written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation, and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle.

If a committee receives contributor information after the contributions have been reported, the committee shall either a) file with its next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before its next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.3(a)(4)(i) and 11 CFR § 104.7)

-Your Year End Report (7/1/97-12/31/97) disclosed an apparent contribution from a corporation (pertinent portion attached). You are

COMMITTEE FOR THE PRESERVATION OF CAPITALISM PAC
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advised that a contribution from a corporation is prohibited by the Act, unless made from a separate segregated fund established by the corporation. This report also indicated that the contribution was refunded on 1/28/98 but your April Quarterly Report (1/1/98-3/31/98) does not disclose this refund. Please amend your April Quarterly Report to disclose this refund on a Schedule B supporting Line 28(a).

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in refunding the amounts will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Alicia K. Richardson
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE **3** OF **8**
FOR LINE NUMBER
11C

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

COMMITTEE FOR THE PRESERVATION OF CAPITALISM PAC

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
AMERICAN CHIROPRACTIC ASSOCIATION PAC 1701 CLARENDON BOULEVARD ARLINGTON, VA 22209		10.10.97	\$2,000
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 2,000	
HEALTH INSURANCE POLITICAL ACTION COMMITTEE 555 15TH STREET, NW, SUITE 600 EAST WASHINGTON, DC 20004		11.31.97	\$2,500
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 2,500	
THE GLAD WELLS PAC 1500 K STREET, NW, SUITE 450 WASHINGTON, DC 20005		12.01.97	\$1,000
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,000	
INTERNATIONAL SHIPHOLDING CORPORATION PAC 650 PONTIAC STREET, SUITE 1700 NEW ORLEANS, LA 70130		7.01.97	\$1,000
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 2,000	
ARKANSAS LONGHORN GAS COMPANY POST OFFICE BOX 2400 SHREVEPORT, LA 71303		3.17.97	\$500
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500	<i>* This check was received on 10/1/97</i>
ACTION MARKETS PAC OF THE CHICAGO BOARD OF TRADE 1455 PENNSYLVANIA AVENUE, NW, SUITE 1235 WASHINGTON, DC 20004		12.01.97	\$1,000
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,000	
EMPLOYEES OF THE INTERGEN COMPANIES IN LA 1776 EMB STREET, NW SUITE 295 WASHINGTON, DC 20005		10.10.97	\$2,500
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 2,500	

SUBTOTAL of Receipts This Page (optional)

\$ 10,500

TOTAL This Period (last page this line number only)